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August 17, 2020

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 10/14/20

Re: *United States v. Bob King*, 18 Cr. 308 (ALC)

Dear Judge Carter:

I was appointed counsel by the Court under the Criminal Justice Act for defendant Bob King on February 20, 2020 and I write to respectfully request an order from the Court requiring the Metropolitan Correctional Center ("MCC") to provide my client with urgently-needed mental health care. Since my appointment, my team and I have followed MCC protocol and have arranged on many occasions to meet telephonically with Mr. King and have spoken on the phone with him on at least fourteen separate occasions, for close to ten hours cumulatively. During these conversations, Mr. King has reported [REDACTED] and he has on multiple occasions asked to be treated by a psychologist at the MCC. Although I have relayed Mr. King's requests to the MCC on three separate occasions, to date the MCC has not provided any mental health treatment to Mr. King in response to these requests. From my perspective as Mr. King's counsel, he is suffering without the provision of mental health care, thus necessitating the Court's intervention.

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While incarcerated at the MCC, Mr. King has received some inconsistent mental health treatment in the form of psychology consults.

However, Mr. King has not been prescribed any while incarcerated at the MCC. Based on my conversations with Mr. King, I understand that he has not been treated by a psychologist at the MCC since August 2019.

On May 4, 2020, Mr. King stated during a legal call and that he had not received any psychological attention despite notifying correctional officers. I immediately reported these symptoms to the MCC,¹² but pointedly did not provide any treatment for Mr. King's apparent mental illness. During a subsequent legal call on July 8, 2020, Mr. King explained I reported these symptoms to the MCC's legal counsel, who confirmed that she had forwarded the report to the MCC's psychology department.¹³ To my knowledge, no appointment was ever scheduled. Finally, during a legal call on July 14, Mr. King confirmed that he still had not been treated by a psychologist. On July 17, I again requested that the MCC provide Mr. King with mental health care,¹⁴ but to no avail—my understanding is that as yet, as recently as yesterday, Mr. King has still not received any treatment in response to these requests.

Mr. King is suffering from a and I am concerned that his condition will continue to worsen without treatment—especially in the environment where understandable concerns about Covid-19 spread within MCC are rampant. I therefore respectfully request that the Court enter an order

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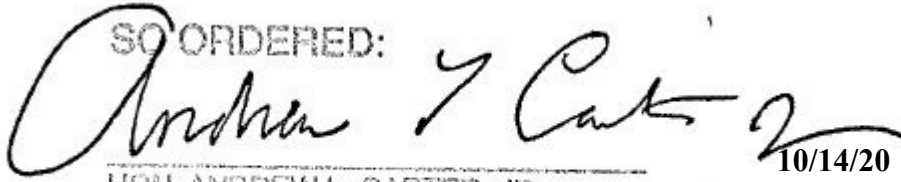
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[REDACTED]
[REDACTED] health care, [REDACTED]

Respectfully Submitted,

/s/ Victor L. Hou

Victor L. Hou

SO ORDERED:

10/14/20
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE